

VIRGINIA

IN THE CIRCUIT COURT FOR THE CITY OF RICHMOND

**JOHNNY O. OLIVERIO,**  
Plaintiff,

v.

Case No: CL23-1624-3

**VIRGINIA COMMONWEALTH UNIVERSITY,**

and

**DR. RAO, President of VCU,**

and

**AMY ANDRES, Director and Associate University Librarian  
VCU art (VCUart) Qatar Libraries,**

and

**TERESA DOHERTY, MLIS, Student Success Librarian  
Defendants.**

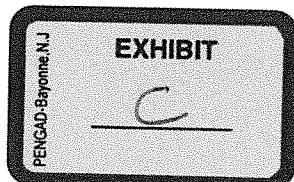
**NOTICE OF FILING NOTICE OF REMOVAL**

Defendant, the Virginia Commonwealth University Board of Visitors<sup>1</sup>, by counsel, hereby provides notice to the Clerk of the Circuit Court for the City of Richmond, Virginia, that the above captioned action has been removed to the United States District Court for the Eastern District of Virginia, Richmond Division.

A Notice of Removal is being filed contemporaneously in the United States District Court for the Eastern District of Virginia, Richmond Division, a copy of which is attached hereto as **Exhibit 1.**

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<sup>1</sup> Plaintiff has named Virginia Commonwealth University. The actual entity is "The Board of Visitors of Virginia Commonwealth University." See Virginia Code §23.1-2300. The entity conducts business as Virginia Commonwealth University ("VCU").



Pursuant to 28 U.S.C. §1446(d), this Court “shall proceed no further unless and until the case is remanded.”

Respectfully Submitted,  
**Virginia Commonwealth University,**  
**Dr. Rao in his official capacity,**  
**Amy Andres in her official capacity, and**  
**Teresa Doherty in her official capacity**

By:   
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M. Elizabeth Griffin (VSB No.: 37745)  
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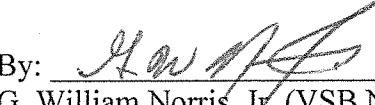
Steven G. Popps  
*Deputy Attorney General*

Coke M. Stewart  
*Senior Assistant Attorney General/ HESS Section Chief*

**CERTIFICATE OF SERVICE**

I hereby certify that on the 16th day of May, 2023, I caused to be served the foregoing Notice of Filing, via email and U.S. Mail, postage prepaid to the following:

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*Pro se Plaintiff*

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